

December 28, 2015

Mr. Miguel D. Tidwell / Pro Se  
5349 Columbia Rd. #J  
Columbia, Md. 21044  
Ph# (410) 300-9846

VS

IMPAQ International LLC / Searle Mitnick  
10420 Little Patuxent Parkway Suite 300  
Columbia, Md. 21044

Complaint:

I Miguel D. Tidwell am filing this Lawsuit against IMPAQ International LLC because the Manager of the Survey Center Stephanie Naber discriminated against me because of my disabilities (mental disability & glaucoma) and identified me in the work place as a Disabled Individual by placing a Sign on the back of my Chair at my workstation that indicated that I have a Disability for everyone to see, which was humiliating for me.

I Miguel D. Tidwell have been working at IMPAQ International LLC for 8yrs., and have never experienced any problems on my job until the new Assistant Managers from Arbitron came to work there. When I first started working there in May 2006 I was Part-Time, and later due

to my hard work and enjoyment of working there I became a Full-Time Employee with benefits in 2008. It was at that time I disclosed to the Human Resources Representative Serap Davaz that I was a Disabled Individual, and I had no job related problems at all until now, since the Assistant Managers from Arbitron were hired I had to reiterate that I am a Disabled Individual, and provide documentation during the months of October-November of 2013 to the Human Resources Dept. confirming that I am a Disabled Individual because of the higher expectations that was implemented in order for the Management of the Survey Center to accommodate my Disabilities; also during this time I met with the Manager of the Survey Center Stephanie Naber along with my Supervisor Leonor Ortiz in Stephanie Naber office and she gave me a Verbal Accommodation for my Disabilities saying "Since you are a long time employee with the Company we can make this accommodation for you" which consisted of Adjustments to my Monitor at my workstation, 7 Records per hour, and the Elimination of Tracing which worked well for me; thereafter around 7-8-14 I was approached by my Supervisor Leonor Ortiz to sign documentation stating that I was going to be suspended for 2 Days on Wed. July 9th 2014, and on Thur. July 10 of 2014 without pay or being able to use my Leave as a full-time employee which was authorized by the Assistant Manager Tony Boston. My Supervisor Leonor Ortiz; also told me that the accommodations that were in place due to my Disabilities were rescinded. Immediately, following that occurrence I

filed a Complaint against the Company with the Office of Human Rights in Columbia, Md., which cross-filed the Complaint with the EEOC. It was the EEOC that gave me a Letter of the Right To Sue.

First of all, IMPAQ was notified that I was a Disabled Individual in 2008 when I met with the Human Resources Representative Ms. Serap Davaz when I became a Full-Time Employee with Benefits. From that time, and throughout my years of employment IMPAQ had plenty of time to request Documentation or engage in the Interactive Process of me working there if there was any problems with me performing the essential functions of my position which was a Lead Telephone Interviewer. I worked on numerous Projects throughout my years of working for IMPAQ. I even worked on multiple Projects at one time. Secondly, there was no change in my Metrics for the Job Corps Project throughout my years of working there, but because my Overall Performance of my essential duties were magnificent I encountered no problems throughout my years of working for IMPAQ. Thirdly, only when I shared my Personal, Private, Confidential Information with the Survey Center Manager Stephanie Naber she Discriminated against me because I shared with her that I have a Mental Disability. She Stigmatized me, and I worked in humiliation until October 31, 2014 when I resigned due to the hostile environment that was created around me. Lastly, when Stephanie Naber placed the Sign on the back of my chair at my workstation, which said "This Chair Is Reserved For

Miguel Tidwell For Ergonomic Reasons When Working", and everyone knows the word Ergonomic indicates a Disability as defined by "Webster". I did not need a new "Chair", and did not ask for one. I did not need a "Special Chair", and did not ask for one because I sat at various places within the Survey Center such as Lead workstations, Interviewer workstations helping to train new Telephone Interviewers, and Supervisor workstations providing Supervisory Support when there was a gap in Supervisor coverage. What happened to me is no different than my getting on a public bus, and showing the bus driver my Disability ID for a reduce fare, and the bus driver shouts out "Your Disabled" now the bus driver has just identified me as a Disabled Individual publicly because my Disability is non-visual. That is against the Law. Not only did the Survey Center Manager Stephanie Naber label my "Chair" identifying me as a Disabled Individual but she shared my Personal, Private, Confidential information throughout the Company, and made a spectacle of me.

Relief:

I Miguel D. Tidwell am seeking Relief in the form of Compensatory Damages Greater than \$75,000 to make me Whole to include Back Pay, and Punitive Damages due to Mental Anguish, and Abuse.

Sincerely,

*Mr. Miguel D. Tidwell*

Mr. Miguel D. Tidwell / Pro Se